

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the
Commonwealth, HTA, and ERS.**

**CERTIFICATE OF NO OBJECTION
AND REQUEST FOR ENTRY, WITHOUT A HEARING, OF
ORDERS GRANTING CERTAIN OMNIBUS OBJECTIONS TO CLAIMS**

On June 12, 2019, the Commonwealth of Puerto Rico (the “Commonwealth”), Puerto Rico Highways and Transportation Authority (“HTA”), and Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and together with the Commonwealth and HTA, the “Debtors”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the representative of the Debtors, pursuant to Section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² filed, among others, the following fourteen (14) omnibus objections (collectively, the “Uncontested Omnibus Objections”) to certain proofs of claims filed against the Debtors:

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² PROMESA has been codified at 48 U.S.C. §§ 2101–2241.

1. *Thirty-Sixth Omnibus Objection (Non-Substantive) of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Duplicate Bond Claims* [ECF No. 7244]³ (the “Thirty-Sixth Omnibus Objection”);
2. *Thirty-Seventh Omnibus Objection (Non-Substantive) of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Duplicate Bond Claims* [ECF No. 7245] (the “Thirty-Seventh Omnibus Objection”);
3. *Thirty-Eighth Omnibus Objection (Non-Substantive) of the Puerto Rico Highways and Transportation Authority and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Duplicate and Deficient Claims* [ECF No. 7247] (the “Thirty-Eighth Omnibus Objection”);
4. *Fortieth Omnibus Objection (Non-Substantive) of the Puerto Rico Highways and Transportation Authority and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Claims Asserted Against the Incorrect Debtor* [ECF No. 7249] (the “Fortieth Omnibus Objection”);
5. *Forty-First Omnibus Objection (Non-Substantive) of the Puerto Rico Highways and Transportation Authority and Employees Retirement System of the Government of Puerto Rico to Duplicate and Incorrect Debtor Claims* [ECF No. 7250] (the “Forty-First Omnibus Objection”);
6. *Forty-Second Omnibus Objection (Non-Substantive) of the Puerto Rico Highways and Transportation Authority and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Duplicate and Deficient Claims* [ECF No. 7252] (the “Forty-Second Omnibus Objection”);
7. *Forty-Third Omnibus Objection (Non-Substantive) of the Puerto Rico Highways and Transportation Authority and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Duplicate, Deficient, and Incorrect Debtor Claims* [ECF No. 7258] (the “Forty-Third Omnibus Objection”);
8. *Forty-Fourth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Claims Asserted Against the Incorrect Debtor* [ECF No. 7265] (the “Forty-Fourth Omnibus Objection”);
9. *Fifty-Second Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Duplicate Claims of ERS Bondholders* [ECF No. 7281] (the “Fifty-Second Omnibus Objection”);
10. *Fifty-Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Duplicate, Deficient, and Incorrect Debtor Claims* [ECF No. 7282] (the “Fifty-Third Omnibus Objection”);

³ Unless otherwise stated herein, ECF citations refer to documents filed in Bankruptcy Case No. 17 BK 3283-LTS.

11. *Fifty-Fourth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Subsequently Amended Claims* [ECF No. 7284] (the “Fifty-Fourth Omnibus Objection”);
12. *Fifty-Fifth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Duplicate Claims of HTA Bondholders* [ECF No. 7285] (the “Fifty-Fifth Omnibus Objection”);
13. *Fifty-Seventh Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Duplicate and Incorrect Debtor Claims* [ECF No. 7290] (the “Fifty-Seventh Omnibus Objection”); and
14. *Fifty-Eighth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Duplicate and Deficient Claims* [ECF No. 7291] (the “Fifty-Eighth Omnibus Objection”).

Responses, if any, to the Uncontested Omnibus Objections were to be filed and served no later than July 9, 2019 at 4:00 p.m. (Atlantic Time) (the “Objection Deadline”). While no responses were filed to any of the Uncontested Omnibus Objections, certain claimants provided additional information related to their claims or elected to voluntarily withdraw their claims after the Uncontested Omnibus Objections were filed. The hearing for two claims subject to the Fifty-Fourth Omnibus Objection was adjourned. *See Notice of Adjournment of Hearing on the Fifty-Fourth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico With Respect To Proofs of Claim of Davidson Kempner Distressed Opportunities International Ltd. (Claim No. 147091) and Oz Credit Opportunities Master Fund, Ltd. (Claim No. 136008)* [ECF No. 7844].

Additionally, the advisors for the Oversight Board conducted a secondary review of the claims subject to the Uncontested Omnibus Objections, and, as a result of this review, the Debtors voluntarily withdrew objections to certain claims. These efforts resulted in the filing, on July 17, 2019, of amended proposed orders and schedules of claims subject to the Thirty-Sixth Omnibus Objection, Thirty-Seventh Omnibus Objection, Forty-Fourth Omnibus Objection, Fifty-Third Omnibus Objection, Fifty-Fourth Omnibus Objection, and Fifty-Fifth Omnibus Objection. *See*

Notice of (A) Withdrawal of Objections to Certain Claims and (B) Submission of Amended Exhibits to Claim Objections [ECF No. 8084].

According to this Court's *Tenth Amended Case Management Procedures* [Case No. 17-03283-LTS, ECF No. 8027-1] (the "Case Management Procedures") and *Order Further Amending Case Management Procedures* [17-03283-LTS, ECF No. 8027], the Court may enter an order granting a request for relief without a hearing upon receipt of a certificate of no objection ("CNO", as defined by the Case Management Procedures). *See* Case Management Procedures, Section III, paragraph P.

In accordance with the Case Management Procedures, the undersigned hereby certifies that this CNO is filed not less than forty-eight (48) hours after the expiration of the Objection Deadline. The undersigned further certifies that counsel for the Oversight Board has reviewed the Court's docket in the above-captioned case not less than forty-eight (48) hours after expiration of the Objection Deadline, and, to the best of counsel's knowledge, no applicable objection, responsive pleading, or request for a hearing with respect to the Uncontested Omnibus Objections appears on the docket.

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WHEREFORE the Debtors respectfully request that the Court (a) enter the proposed orders attached hereto as **Attachments 1-8**, which are identical to the proposed orders attached to the Uncontested Omnibus Objections, and (b) enter the proposed orders attached hereto as **Attachments 9-14**, which are identical to the amended proposed orders filed July 17, 2019.

Dated: July 23, 2019
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

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